



Infrastructure · Water · Environment · Buildings

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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3 Progress Report (March 2013)

ENVIRONMENT

Dear Mr. Krawczyk:

Date:

April 5, 2013

On behalf of Georgia-Pacific LLC (Georgia-Pacific), attached is the March 2013 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent (AOC) for the Remedial Design/ Remedial Action at the KHL OU, as was fully executed on February 8, 2000. Please note, however, pursuant to Section XVI of the AOC, after a Certificate of Completion of Construction is issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, reports documenting operation, maintenance, and monitoring activities shall be submitted pursuant to the schedule set forth in the Operation and Maintenance Plan.

Contact:

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Our ref:

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If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Patrick McGuire
Principal Environmental Engineer

Attachment

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC
Daria Devantier, Michigan Department of Environmental Quality
Michael Berkoff, USEPA Region 5
Dawn Penniman, P.E., ARCADIS

**PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
KING HIGHWAY LANDFILL OPERABLE UNIT 3**

MARCH 2013

PREPARED APRIL 5, 2013

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

**KEITH KRAWCZYK, PROJECT COORDINATOR
REMEDIATION AND REDEVELOPMENT DIVISION**

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

**Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3
March 2013 Monthly Progress Report**

Remedial Activities

- Georgia-Pacific, Michigan Department of Environmental Quality (MDEQ), and ARCADIS have been in communication via email in the interest of revising and resubmitting the DRAFT FINAL *Report for Completion of Construction* (Completion Report), DRAFT FINAL *Operation and Maintenance Plan* (O&M Plan), and Flow Reversal Determination Prior to Groundwater Sampling Events Technical Memorandum (Flow Reversal Memo) to MDEQ based on MDEQ's January 31, 2013 comment letter and the February 27, 2013 live meeting:
 - On March 1, ARCADIS transmitted to MDEQ revised text for the last bullet in Section 1.1 of the O&M Plan.
 - On March 5, ARCADIS transmitted to MDEQ a list of items to be resolved prior to resubmittal of the Completion Report and O&M Plan, as well as additional O&M items to be completed.
 - On March 6, ARCADIS wrote to MDEQ seeking clarification on Section 3.6 of the O&M Plan and the format of the revised Completion Report and O&M Plan documents to be resubmitted.
 - On March 8, MDEQ notified ARCADIS that "clean" versions of the revised, updated "FINAL DRAFT" Completion Report and O&M Plan should be submitted.
 - On March 15, MDEQ notified Georgia-Pacific of the schedule for transmitting revised language for Section 4.5 of the O&M Plan regarding future reductions in groundwater monitoring.
 - On March 18, MDEQ transmitted to Georgia-Pacific revised text for Section 4.5 of the O&M Plan.
 - On March 19, Georgia-Pacific transmitted to MDEQ a response to the revised text for Section 4.5 of the O&M Plan.
- On March 7, ARCADIS submitted to MDEQ the February 2013 Monthly Progress Report.
- On March 14, ARCADIS submitted to MDEQ a revised version of the proposed specifications for permanent markers to be installed at the KHL.
- On March 19, ARCADIS submitted to MDEQ the FINAL DRAFT Completion Report and O&M Plan (including Standard Operating Procedure E, *Groundwater Sampling Procedures*), and revised Flow Reversal Memo.
- On March 22, ARCADIS follow-up with MDEQ regarding the recently submitted Completion Report, O&M Plan, and Flow Reversal Memo and whether any additional items were required for MDEQ's review.

**Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3
March 2013 Monthly Progress Report**

- On March 26, MDEQ responded to ARCADIS regarding the recently submitted FINAL DRAFT Completion Report and O&M Plan, and Flow Reversal Memo and the status of their review.
- On March 29, MDEQ notified Georgia-Pacific of the schedule for the internal meeting where representatives of the Remediation and Redevelopment Division to review MDEQ's recommendation to accept the construction certification for the KHL OU.

Operation, Maintenance, and Monitoring Activities

- On March 6, ARCADIS confirmed with MDEQ that the revised investigation plan for off-site landfill gas migration at the KHL should propose the installation of an additional gas probe to the west of existing gas probe GW-14.
- On March 12, ARCADIS submitted the 2013 1st quarter landfill gas monitoring report to MDEQ.
- On March 13, ARCADIS submitted to MDEQ an Investigation Plan for Off-Site Landfill Gas Migration at the King Highway Landfill, which proposes to install four additional permanent perimeter gas probes along the western property line of the KHL and to relocate existing gas probe GW-15 further north. ARCADIS awaits approval of this plan.

Upcoming Activities

- On April 11, Georgia-Pacific anticipates that the MDEQ will hold an internal meeting to review the site closure.
- In April, ARCADIS will coordinate with MDEQ to schedule the 2013 2nd quarter landfill gas monitoring event and 2013 semi-annual landfill inspection. These events are scheduled to be performed in May.
- In April, Georgia-Pacific anticipates that the Restrictive Covenant and associated easements and access agreements will be finalized.
- ARCADIS will implement the Investigation Plan for Off-Site Landfill Gas Migration at the King Highway Landfill once the plan is approved by MDEQ.